



October 16, 2017

Michelle Ramirez
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P65Public.Comments@oehha.ca.gov

**Re: Comments to the Developmental and Reproductive Toxicant Identification Committee (DARTIC)
on Possible Listing of n-Hexane**

Dear Ms. Ramirez:

The Consumer Specialty Products Association¹ (CSPA) offers the following comments to the November 29, 2017 meeting of the Developmental and Reproductive Toxicant Identification Committee (DARTIC). DARTIC is being asked by California's Office of Environmental Health Hazard Assessment (OEHHHA) to advise OEHHHA on the possible listing of n-Hexane. CSPA strongly encourages that the DARTIC recommend development of a Maximum Allowable Dose Level (MADL) in conjunction with listing, if recommended.

n-Hexane may be present at trace levels in hydrocarbon and/or petroleum-based formulated products and ensuring that amounts are well below a toxicological risk level has long been addressed. However, in the absence of a published MADL, there would likely be uncertainty as to the appropriate safe harbor - leading to differing values by different manufacturers and suppliers which would lead to inconsistent warning labeling. This lack of clarity would likely lead to situations where compliant products are labeled in such a way that provided less than helpful information to consumers and unduly exposed companies to private enforcement concerns.

¹ CSPA is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$100 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care®, and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety and sustainability of their products.

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CSPA appreciates the opportunity to comment and **recommends development of a Maximum Allowable Dose Level for n-hexane should it be listed by the DARTIC.**

Sincerely,

A handwritten signature in cursive script that reads "Kristin Power".

Kristin Power
Senior Vice President, State Government
Relations & Public Policy

A handwritten signature in cursive script that reads "Steven Bennett".

Steven Bennett, Ph.D.
Vice President, Scientific Affairs

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